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6 Attorneys for Plaintiff
United States of America
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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,
11
12 Plaintiff,
v.
13 PAULO PEREZ-MENDOZA,
14
15 Defendant.
16

CASE NO. 2:24-MJ-0033 DB

**STIPULATION RE TREATMENT OF
PROTECTED INFORMATION**

17
18 WHEREAS, the discovery in this case contains a large amount of other people's personal
19 identifying information, including personal identification numbers, dates of birth, financial account
20 numbers, telephone numbers, and residential addresses ("Protected Information");

21 WHEREAS, the discovery in this case also contains information relating to confidential sources;
22 and

23 WHEREAS, the parties desire to avoid the necessity of large-scale redactions and the
24 unauthorized disclosure of Protected Information to anyone not a party to this case;

25 The parties agree that entry of a stipulated protective order is appropriate.

26 THEREFORE, the parties stipulate as follows:
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1 1. This Court may enter a protective order pursuant to Rule 16(d) of the Federal Rules of
2 Criminal Procedure and its general supervisory authority that pertains to all discovery produced to the
3 defendants' counsel in this case;

4 2. By signing this stipulation, defense counsel agree not to share any discovery that contains
5 Protected Information with anyone other than defense counsel and defense counsel investigators and
6 support staff. Defense counsel may permit the defendants to review unredacted discovery that contains
7 Protected Information in the presence of defense counsel or defense counsel investigators and support
8 staff. But defense counsel shall not allow the defendants to copy the Protected Information and may
9 only provide the defendants with copies of discovery from which the Protected Information is redacted;

10 3. The discovery may be used only in connection with the litigation of this case. The
11 discovery is now and will remain the property of the government. Defense counsel will return the
12 discovery to the government, or certify that it has been destroyed, at the conclusion of the case;

13 4. Defense counsel will store the discovery in a secure place and will use reasonable care to
14 ensure that it is not disclosed to third persons in violation of this agreement; and

15 5. In the event that the defendants substitute counsel, undersigned defense counsel agree to
16 withhold discovery from the new defense counsel until the new defense counsel agree to be bound by
17 this stipulation and resulting order.

18 IT IS SO STIPULATED.

19 DATED: March 25, 2024

/s/ Meghan McLoughlin
Meghan McLoughlin
Counsel for Paulo Perez-Mendoza

22 DATED: March 25, 2024

/s/ Karen A. Escobar
Karen A. Escobar
Assistant United States Attorney

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**ORDER RE TREATMENT OF PROTECTED
INFORMATION**

18
19 For good cause shown, the stipulation between counsel, dated March 25, 2024, in the above case,
20 regarding the treatment of protected information contained in the discovery is approved.

21 IT IS SO ORDERED.

22 Dated: March 26, 2024

23 
24 CAROLYN K. DELANEY
25 UNITED STATES MAGISTRATE JUDGE
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27
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